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December 2, 2005

RECEIVED
DEC 05 2005
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

OF COUNSEL:

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Kathy Hammond
United States Clerk of Court
225 South Pierre St., #405
Pierre, South Dakota 57501

Re: Verizon Wireless vs. PUC
Civil Number 04-3014
Our File Number 04-181

Dear Kathy:

Enclosed herein you will find for filing in the above-named case the original and one copy of the MOTION OF DEFENDANTS AND INTERVENORS FOR ENLARGEMENT OF TIME FOR RESPONSE AND AMENDMENT OF RULE 16 SCHEDULING ORDER.

By copy of this letter, I am also serving those persons named on the Certificate of Service.

Sincerely yours,



Margo D. Northrup
Attorney at Law

MDN/ph

Enclosures

CC: Rolayne Ailts Wiest (with enclosure)
Rich Coit (with enclosure)
Randy W. Houdek (with enclosure)
Gene N. Lebrun and Steven J. Oberg (with enclosure)
Philip R. Schenkenberg and David C. McDonald (with enclosure)

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

RECEIVED
DEC 05 2005
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Verizon Wireless (VAW) LLC,
CommNet Cellular License Holding, LLC,
Missouri Valley Cellular, Inc.,
Sanborn Cellular, Inc., and
Eastern South Dakota Cellular, Inc.,
d/b/a VERIZON WIRELESS,

Plaintiff,

vs.

Bob Sahr, Gary Hanson, and Dustin John-
son, in their official capacities as the
Commissioners of the South Dakota Public
Utilities Commission,

Defendants,

South Dakota Telecommunications Ass'n
and Venture Communications Cooperative,

Intervenors.

Civil Number 04-3014

MOTION FOR
ENLARGEMENT OF TIME
FOR RESPONSE AND
AMENDMENT OF
RULE 16 SCHEDULING ORDER

COME NOW South Dakota Telecommunications Association and Venture Communications Cooperative, by and through Darla Pollman Rogers and Margo D. Northrup, of Riter, Rogers, Wattier & Brown, LLP; and the South Dakota Public Utilities Commission, by and through Rolayne Ailts Wiest, and move the Court for an Order enlarging the time for the parties to reply to the Summary Judgment Motion filed by Verizon in this matter, and to amend the Rule 16 Scheduling Order accordingly. As grounds for Defendants' and Intervenors' Motion, the Defendants and Intervenors state as follows:

1. On July 21, 2005, an Amended Rule 16 Scheduling Order was filed in this matter. Pursuant to the Amended Rule 16 Scheduling Order, all motions, other than motions in limine, together with supporting briefs, were to have been filed by November 15, 2005. Opposing parties were given no later than twenty (20) days thereafter to file answering materials, and briefs and Reply Briefs were to be filed ten (10) days thereafter.

2. On November 15, 2005, Verizon filed a Motion for Summary Judgment with extensive statement of facts and supporting affidavits. Due to the extensive documents, the Defendants and Intervenors are jointly requesting an additional fourteen (14) days to respond to the Summary Judgment Motion. In return, Defendants and Intervenors are willing to agree to a ten (10) day extension of time for Verizon to provide its Reply Brief.

3. All parties have been in contact in reference to the enlargement of time, and are agreeable to the same.

4. The Pre-trial Conference is currently scheduled for January 13, 2006. If the Court grants this Motion, the parties also respectfully request that the pre-trial conference be moved to a later date to accommodate the enlargement of time.

WHEREFORE, the Defendants and Intervenors, by and through their attorneys of record, respectfully request the Court to enlarge the time for response and to amend the Rule 16 Scheduling Order.

Respectfully submitted this second day of December, 2005.

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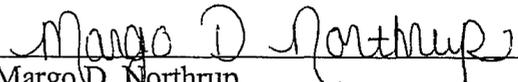
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was served via the method(s) indicated below, on the second day of December, 2005, addressed to:

Gene N. Lebrun	(X)	First Class Mail
Steven J. Oberg	()	Hand Delivery
Lynn, Jackson, Shultz & Lebrun	()	Facsimile
P. O. Box 8250	()	Overnight Delivery
Rapid City, South Dakota 57709	()	E-Mail

Philip R. Schenkenberg	(X)	First Class Mail
David C. McDonald	()	Hand Delivery
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Dated this second day of December, 2005.


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